

1 **STIP**

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12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 KATHERINE MAYORGA, an individual) **DJA**
15 Plaintiff,) 2:19-cv-00168-JAD-CWH
16 vs.)
17 CRISTIANO RONALDO, individually,) ECF No. 147
18 Does I-XX and Roe Corporations I-XX;
19 Defendants.)
20 _____

21 **STIPULATION TO EXTEND THE TIME FOR PLAINTIFF TO FILE AN OBJECTION**

22 **TO THE MAGISTRATE JUDGE'S ORDER AND REPORT RECOMMENDATIONS**

23 (First Request)

24 IT IS HEREBY STIPULATED AND AGREED BY AND BETWEEN Plaintiff
25 KATHERINE MAYORGA by and through her attorney LESLIE MARK STOVALL, ESQ. and
26 Defendant, CRISTIANO RONALDO, by and through his attorney PETER S. CHRISTIANSEN,
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1 ESQ., that Plaintiff's objection to [ECF No. 143] Magistrate's Order and Report and
2 Recommendations, currently due on October 20, 2021, be extended to November 3, 2021.
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4 Plaintiff's counsel seeks a two-week extension of time for the filing of objections to the
5 Magistrate's Order and Report and Recommendations filed October 6, 2021 [ECF 143].
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7 Plaintiff's counsel represents he was unable to complete drafting objections on or before October
8 20, 2021 for the following reasons:
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10 1. Plaintiff counsel was preparing Case No.: A-18-786457-C entitled Ware
v. Hardy for pretrial conference and trial in Department 31 of the Clark
County District Court at the time of the filing of the magistrate judge's
report and recommendation.
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12 2. On October 6, 2021, the Court entered a minute order notifying the
parties the transcript of the September 17, 2021 hearing was available. On
October 8, 2021 plaintiff's counsel attempted to order the subject transcript
but as of October 19, 2021, had not yet received a copy.
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14 3. Defendant attached as exhibits to the underlying Motion for Case
Terminating Sanctions (ECF. No. 111, Exhibit X), certified translations of
decisions from courts in Portugal and Germany. ECF No. 111 was filed
May 27, 2021. Attached to Defendants' Reply brief in support of the
subject motion was a supplemental declaration of Defendant's prior counsel
confirming the foreign court decisions were in response to Defendant's
request for injunctive relief to quell further publication of stolen documents.
That Reply brief (ECF No. 133) was filed August 13, 2021. This Court
held a hearing on these issues on September 7, 2021, and the Magistrate's
Report and Recommendations were filed on October 6, 2021. Plaintiff's
counsel is now seeking the opinion of a Portuguese and German lawyer as
to whether Defendant's foreign petitions asserted the attorney client
privilege to protect documents from publication and if so whether the
decisions denying the petitions constitute a judgement such that the attorney
client privilege does not apply to the information or documents which was
the subject of the petitions.
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25 4. Defendant asserts the record is already complete as to these issues and
defers to this Court as to whether good cause for the requested extension
exists. However, Defendant does not oppose the requested two-week
extension of time.
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2:19-cv-00168-JAD-CWH
*STIPULATION TO EXTEND THE TIME FOR
PLAINTIFF TO FILE AN OBJECTION TO THE
MAGISTRATE JUDGE'S ORDER AND
REPORT RECOMMENDATIONS*

Dated this 20th, October, 2021
STOVALL AND ASSOCIATES

Dated this 20th, October, 2021
CHRISTIANSEN TRIAL LAWYERS

/s/ Leslie Mark Stovall

/s/ *Kendeleee L. Works*

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ORDER

Based on the parties' stipulation [ECF No. 147] and good cause appearing, IT IS HEREBY ORDERED that Plaintiff's deadline to file objections to the magistrate judge's report and recommendation [ECF No. 143] is extended to November 3, 2021.

U.S. District Judge Jennifer A. Dorsey
Dated: October 21, 2021